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November 13, 2007

Ms. Sylvette Seay  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: Victory in November Election PAC (VINE PAC)  
FEC ID No. C00378695

Dear Ms. Seay:

This is in response to your letter dated October 12, 2007 concerning the Mid-Year Report (1/1/07 6/30/07) of Victory in November Election PAC (the "Committee").

You have asked about expenditures for "Catering" and " Fundraising Consulting Services." These expenditures were for the Committee's own fundraising and were not made on behalf of any specifically identified federal candidate.

You have also asked about the payments for the Committee's administrative expenses. Victory in November Election PAC is a small committee that has few administrative expenses. Currently, it has no paid staff members, no rented office space and relies primarily on our firm, Perkins Coie LLP, and a fundraising firm to administer the Committee's activities. All of the expenses incurred to operate the Committee, including payments to its consultant, have been reported as federal operating expenditures on the Committee's FEC reports.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Judy Corley  
Counsel to Victory in November Election PAC  
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